

### **REMARKS**

In view of the above amendment, Applicants believe the pending application is in condition for allowance. Claims 1-17 and 19-21 are now present in this application, of which claims 1, 5, 9, 20, and 21 are independent. By this amendment, claim 18 has been canceled, claims 1-13, 15-17, and 19 have been amended, and claims 20 and 21 have been added. Reconsideration of this application, as amended, is respectfully requested.

#### **Information Disclosure Citations**

Applicants thank the Examiner for considering the references supplied with the Information Disclosure Statements filed September 25, 2007, and November 29, 2007, and for providing Applicants with initialed copies of the PTO-SB08 form filed therewith.

#### **Rejection Under 35 U.S.C. § 112, 2<sup>nd</sup> Paragraph**

Claims 1-19 stand rejected under 35 U.S.C. § 112, 2<sup>nd</sup> Paragraph. This rejection is respectfully traversed.

The Examiner has set forth certain instances wherein the claim language is not clearly understood.

In order to overcome this rejection, Applicants have amended claims amended independent claims 1, 5, and 9 to correct each of the deficiencies specifically pointed out by the Examiner. Applicants respectfully submit that the claims, as amended, particularly point out and distinctly claim the subject matter which Applicants regard as the invention. Accordingly, reconsideration and withdrawal of this rejection are respectfully requested.

#### **Rejections under 35 U.S.C. § 103**

Claims 1-3, 5-7, 9, 14, and 18 stand rejected under 35 U.S.C. § 103(a) as being unpatentable over Dober in view of Allen or Cho; claims 4, 8, and 10 stand rejected under 35 U.S.C. § 103(a) as being unpatentable over Dober in view of Allen or Cho, and further in view of Nukaga or Otani; and claims 11-13, 15-17, and 19 stand rejected under 35 U.S.C. § 103(a) as being unpatentable over

Dober in view of Allen or Cho, either alone or in further view of Hosokwa and/or Kleiber. These rejections are respectfully traversed.

At the outset, Applicants respectfully disagree with the Examiner's position that it is *prima facie* obvious to rearrange parts. Applicants assume that the Examiner is referring to the *In re Japikse*, decision to support this assertion. However, as noted in M.P.E.P. § 2144.04(VI)(C), which cites to *In re Japikse*, "[c]laims to a hydraulic power press which read on the prior art except with regard to the position of the starting switch were held unpatentable because shifting the position of the starting switch **would not have modified the operation of the device.**" (Emphasis Added). Clearly moving the heater of Dober would have modified the operation of the device and therefore *In re Japikse* cannot be relied on to justify the rearrangement of the heater of Dober.

Furthermore, Applicants disagree with the Examiner's assertion that previously filed arguments essentially argued against bodily incorporation. Rather, Applicants noted that the physical operation of a vertical axis laundry machine operates under fundamentally different principles than that of a horizontal washing machine, namely the nature of the washing process dictates washing approaches (i.e., submersion (soaking) v. wetting). As such, one of ordinary skill in the art would not look to combine teachings from the two different types of laundry machines.

Turning to the present rejection of the claims, Applicants respectfully submit that the independent claims, as amended, define over the cited prior art for a number of reasons. Applicants incorporate the arguments set forth in the previous response and provide the following additional comments.

Independent claim 1, as amended, is directed to a method for smoothing wrinkles including, *inter alia*, "injecting the generated steam from an upper location to a lower location to the laundry in a drum while rotating the drum." Applicants respectfully submit that this combination of elements as set forth in independent claim 1 is not disclosed or made obvious by the prior art of record.

In Dober's method, vapor is supplied from below the drum. As such, most of the vapor cannot reach laundry in the drum. Rather, because the vapor is generated from below the drum, the drum wall blocks most of the vapor from entering the drum. Generally, a drum has multiple holes on holes to allow wash water to flow out of the drum. Therefore, only the vapor passing through the

holes can reach the laundry. Moreover, laundry stacked in the drum will block the holes, even when the drum is being rotated. As a result, just small amounts of vapor will actually enter into the drum.

None of the other references relied on by the Examiner show or describe injecting the generated steam from an upper location to a lower location to the laundry in a drum while rotating the drum to remove wrinkles. Therefore the hypothetical combinations would fail to teach or suggest the claimed method of removing wrinkles as set forth in independent claim 1.

Independent claim 5, as amended, is directed to a method for smoothing wrinkles including, *inter alia*, “boiling the supplied water to generate steam.” Independent claim 9 has been similarly amended. Applicants respectfully submit that this combination of elements as set forth in independent claims 5 and 9 are not disclosed or made obvious by the prior art of record.

In Dober’s method, water in a tub is heated to generate vapor. Because the size of the tub is large, a relatively large amount of water is held in the tub for generating for vapor, which results in a large amount of electrical power consumption to generate the vapor.

Further, in Dober’s method, high temperature steam is not generated. Specifically, Dober discloses that the water is heated to only 80°C. By contrast, as set forth in amended claim 5, the method requires that the steam is generated by **boiling**, which normally occurs at 100°C. Consequently, in Dober’s method, vapor rather than steam is generated.

None of the other references relied on by the Examiner show or describe boiling the water to generate steam. Therefore the hypothetical combinations would fail to teach or suggest the claimed method of removing wrinkles as set forth in independent claims 5 and 9.

For the foregoing reasons, Applicants respectfully submit that independent claims 1, 5, and 9 are allowable over the cite prior art. Accordingly, reconsideration and withdrawal of the § 103 rejections are requested.

With regard to dependent claims 2-4, 6-8, and 10-19, Applicants submit that these claims depend, either directly or indirectly, from one of independent claims 1, 5, and 9, which are allowable for the reasons set forth above, and therefore these claims are allowable based on their dependence from one of claims 1, 5, and 9. Reconsideration and allowance thereof are respectfully requested.

For example, dependent claim 16 recites that “the supplying of the water includes supplying water to a separate steam generator located above the drum of the washing machine.” Because the claimed invention uses a separate steam generator, the process for supplying steam is controlled more precisely than method taught by Dober, which relies on heating water, but not boiling the water, beneath a drum to allow vapor to rise up into the drum.

### **Non-statutory Obviousness-Type Double Patenting Rejection**

Claims 1-3, 5-7, and 9 stand provisionally rejected under the judicially created doctrine of non-statutory obviousness-type double patenting as being unpatentable over claim 8 of copending Application No. 11/181,801 in view of Allen or Cho, and claim 5 of copending Application No. 10/751,978 in view of Dober and further in view of Allen or Cho. These rejections are respectfully traversed for the reasons set forth in the previous response.

In addition, as noted by the Examiner, because no claim has been indicated as being allowed at this time, the filing of a terminal disclaimer would be premature at this time.

### **Claims 20 and 21**

Claims 20 and 21 have been added for the Examiner’s consideration.

Independent claim 20 recites a combination of steps in a method for smoothing wrinkles of the laundry in the washing machine, the method including “detecting an input command to perform a wrinkle smoothing process,” “supplying water into a separate steam generator,” “heating the water supplied into the steam generator to generate steam when the command signal for smoothing wrinkles of the laundry is inputted,” “injecting the generated steam to the laundry in a drum while rotating the drum,” and “displaying that the wrinkle smoothing process is being performed.”

Independent claim 21 recites a combination of steps in a method for smoothing wrinkles of the laundry in the washing machine, the method including “detecting an input command to perform a wrinkle smoothing process,” “supplying water into a separate steam generator,” “boiling the water supplied into the steam generator to generate steam when the command signal for smoothing wrinkles of the laundry is inputted,” “injecting the generated steam through a

nozzle to the laundry in a drum while rotating the drum,” and “displaying that the wrinkle smoothing process is being performed.”

Applicants respectfully submit that these combinations of steps as set forth in independent claims 20 and 21 are not disclosed or made obvious by the prior art of record.

Consideration and allowance of claims 20 and 21 are respectfully requested.

### **Office Action**

The Office Action contains numerous characterizations of the invention, the claims, and the related art, with which Applicants do not necessarily agree. Unless expressly noted otherwise, Applicants decline to subscribe to any statement or characterization in the Office Action.

### **CONCLUSION**

All of the stated grounds of rejection have been properly traversed, accommodated, or rendered moot.

Applicants therefore respectfully request that the Examiner reconsider all presently outstanding rejections and that they be withdrawn. It is believed that a full and complete response has been made to the outstanding Office Action, and as such, the present application is in condition for allowance.

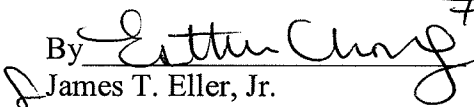
If the Examiner believes, for any reason, that personal communication will expedite prosecution of this application, the Examiner is invited to telephone Chad D. Wells, Registration No. 50,875, at (703) 205-8000, in the Washington, D.C. area.

Prompt and favorable consideration of this Amendment is respectfully requested.

If necessary, the Commissioner is hereby authorized in this, concurrent, and future replies, to charge payment or credit any overpayment to Deposit Account No. 02-2448 for any additional fees required under 37 C.F.R. §§ 1.16 or 1.17; particularly, extension of time fees.

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Respectfully submitted,

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